



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JAN 23 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7663 6469**  
**RETURN RECEIPT REQUESTED**

Ms. Linda Nichols  
Supervisor Minneapolis Area  
Magellan Midstream Partners, L.P.  
2451 West County Road C  
St. Paul, Minnesota 55113

Re: Notice of Violation  
RCRA Compliance Evaluation Inspection – Magellan Midstream Partners, L.P.  
EPA I.D.: MND 000 685 768

Dear Ms. Nichols:

On May 26, 2010, a representative of the U.S. Environmental Protection Agency inspected the Magellan Midstream Partners, L.P. (Magellan) facility located in St. Paul, Minnesota. The purpose of the inspection was to evaluate Magellan's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on information provided by Magellan personnel, a review of records, and personal observations made by the inspector at the time of the investigation, EPA has determined that Magellan is in violation of hazardous waste regulations in the Minnesota Administrative Rules (Minn. R.) and in corresponding provisions in the Code of Federal Regulations (CFR), as specified below.

We find that Magellan was in violation of the following requirements:

1. A person who generates a waste must evaluate the waste to determine if it is hazardous within sixty (60) days of initially generating the waste. Waste that is not evaluated within sixty (60) days of the generation start date must be managed as a hazardous waste, and the person who produces the waste must be considered a generator until the waste is determined to be non-hazardous. *See*, Minn. R. part 7045.0214 Subpart 1 [40 CFR § 262.11].

At the time of the inspection, Magellan was storing an unidentified waste in one 55-



gallon container. The container was being stored with other containers of identified hazardous waste; however, the contents of the container had not been identified and the container did not include an accumulation start date. Therefore, Magellan failed to determine if this waste was hazardous within sixty (60) days and failed to manage the wastes as a hazardous waste, in violation of the above-mentioned generator requirement.

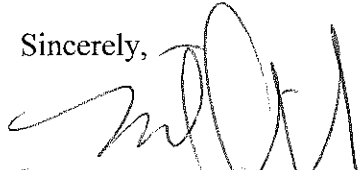
2. A generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within thirty-five (35) days of the date the waste was accepted by the initial transporter must contact the transporter and the owner or operator of the designated facility to determine the status of the hazardous waste. A generator must submit an exception report to the commissioner if the generator has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within forty-five (45) days of the date the waste was accepted by the initial transporter. *See*, Minn. R. part 7045.0298 Subpart 1 [40 CFR § 262.42(a)(2)].

At the time of the inspection, Magellan did not have on-site, as a record, a copy of one signed manifest, number 005614638, dated 7/3/2012, from the designated facility that received the waste; and did not have documentation that an exception report was submitted to the commissioner within forty-five (45) days of the date the waste was accepted by the initial transporter. Therefore, Magellan failed to meet the above-mentioned requirement.

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violations and requiring compliance immediately or within a specified time period.

Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after your receipt of this letter documenting the actions, if any, that you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Jamie L. Paulin, U.S. Environmental Protection Agency, Region 5 (LR-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at (312) 886-1771.

Sincerely,

  
for Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: John Elling, Minnesota Pollution Control Agency (john.elling@state.mn.us)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

**RCRA COMPLIANCE EVALUATION INSPECTION REPORT**

**SITE NAME:** Magellan Midstream Partners, L.P.  
(Williams Pipeline Company)

**EPA ID No.:** MND 000 685 768

**LOCATION ADDRESS:** 2451 West County Road C  
St. Paul, Minnesota 55113

**NAICS CODE(S):** 48691 [Pipeline Transportation of Refined Petroleum  
Products]

**DATE OF INSPECTION:** November 13, 2012

**EPA INSPECTOR:** Jamie L. Paulin  
Chemist  
LR-8J  
Compliance Section 1  
(312) 886-1771 Direct  
(312) 353-4788 Facsimile  
paulin.jamie@epa.gov

**PREPARED BY:** Jamie L. Paulin  
Jamie L. Paulin  
Chemist  
10/22/13  
Date

**REVIEWED BY:** Michael Cunningham  
Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
01/16/14  
Date



## INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the Magellan Midstream Partners, L.P. [formerly, Williams Pipeline Company] (Magellan), located at 2451 West County Road C, St. Paul, Minnesota, to determine Magellan's compliance with the Resource Conservation and Recovery Act (RCRA), including used oil regulations.

Magellan notified as a large quantity generator (LQG) on or about February 29, 1992, and had re-notified as a small quantity generator (SQG) on January 23, 2013. They operate the longest refined petroleum products pipeline system in the country, measuring approximately 9,600 miles, which runs from the upper mid-west running south into Texas and Oklahoma. The pipeline is also a terminal facility, where about 200-300 trucks per day transport petroleum from Magellan in St. Paul.

Magellan generates hazardous waste, such as petroleum contaminated materials, sand blast grit and tank clean-outs. Mainly, D001 (ignitable) and D018 (benzene) hazardous waste numbers apply to these wastes.

Magellan employs about 24 people and operates 24 hours per day on a 125 acre facility area. The company was previously named Williams Pipeline Company and changed its name to Magellan in late 2003.

## OPENING CONFERENCE:

I entered the Magellan facility at 11:00 am on November 13, 2012. I introduced myself, presented my credentials, and described the purpose of my visit. I met with Ms. Linda Nichols, Supervisor Minneapolis Area. The personnel that were in attendance at the opening conference are listed in *Table 1*.

**Table 1. Personnel in Attendance during CEI at Magellan.**

Personnel	Title	Department
Linda Nichols	Supervisor Minneapolis Area	Magellan
Jamie Paulin	Chemist	EPA RCRA Branch





I provided a Small Business Resources Information Sheet and the MnTAP Pollution Prevention and Energy Efficiency brochure to Ms. Nichols. Ms. Nichols did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided. Ms. Nichols described the process and operations of Magellan during the opening conference. We began the physical site inspection immediately following the opening conference.

#### **SITE INSPECTION:**

Ms. Nichols escorted me on the physical site inspection, which began in the 20 cubic yard roll-off storage area, located outside and toward the middle of the property. The roll-off was labeled with the words "Hazardous Waste," and with an accumulation start date of 7/13/12. Ms. Nichols explained that the roll-off was storing corrosive blast grit. The accumulation date would have suggested that this was storage of hazardous waste greater than ninety (90) days.

However, during the inspection, Ms. Nichols explained that the material was non-hazardous and had been mislabeled. She did provide me with the analytical results during the record review showing that the material in the roll-off was non-hazardous. *See*, photographs 1-3.

Ms. Nichols then showed me the Universal Waste Storage Building. The Universal waste was comprised of fluorescent light bulbs, which were being stored in closed containers with universal waste labels. *See*, photograph 4.

We then proceeded to the hazardous waste storage area. Magellan was storing hazardous waste in 55-gallon containers. The containers were either locked in a shed or locked in a fenced area for storage. Ms. Nichols explained that they had been generating less than 1,000 kilograms of hazardous waste per month for the last three years.

Five containers of sorbent pads and petroleum-impacted soil stored in this storage area were closed and marked with hazardous waste labels. However, a sixth 55-gallon container was being stored with no identification of its contents. Ms. Nichols was not sure what was being stored within that container. *See*, photographs 5 and 6.

Ms. Nichols explained that Magellan has an oil/water separator on-site. According to Ms. Nichols, the water travels to the North/West corner of the property to a retention pond, where the oil is collected and contained. The oil/water separator controls the storm water and any residual oil running from the pipeline or terminals during rain-time.

Lastly, Magellan was storing one 55-gallon container in the satellite accumulation area (SAA). The container was storing hazardous aerosol solvent wastes, which were being shipped off-site for disposal as hazardous waste. *See*, photograph 7.



This concluded the site inspection and we continued to Ms. Nichols' office where I conducted the Records Review.

## **RECORDS REVIEW:**

Ms. Nichols aided me in the review of the hazardous waste records after completing the physical site inspection.

### **1. Personnel Training**

Magellan did have a RCRA training program in place, which included documentation of annual training. *See*, attachment 2, examples of training documents.

### **2. Manifests**

I reviewed the manifests of the hazardous waste shipments for the years 2010, 2011, and 2012. Magellan was missing a copy of one signed manifest, (005614638 dated 7/3/12), within their records. They did not submit an Exception Report to the state as required by Minn. R. part 7045.0298 [40 CFR § 262.42(b)] When I was reviewing the manifests, Ms. Nichols provided me with the analytical results showing that the material in the roll-off, that contained the words, "Hazardous Waste," and a date of accumulation over ninety (90) days, was non-hazardous. According to the analytical, the material was not corrosive and did not contain hazardous constituents above regulatory levels.

### **3. Waste Analysis and Recordkeeping**

I observed that Magellan did have, as a record on-site, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

### **4. Contingency Plan**

A Contingency Plan was available for my review during the inspection and contained all of the elements required under Minn. R. part 7045.0572 Subpart 4 [40 CFR § Section 265.52]. *See*, attachment 3, Figure E-3 – EPA/RCRA Cross Reference.

### **5. Preparedness and Prevention**

Agreements with local emergency authorities, contractors, or local hospitals were available for my review during the inspection. *See*, attachment 3, Figure E-3 – EPA/RCRA Cross Reference.



## **6. Annual Reporting**

Magellan filed an annual report with the Minnesota Pollution Control Agency by March 1 for the reporting year of 2010 and 2011. They are currently listed as an SQG within the EPA's RCRAInfo database.

## **7. Weekly and Daily Inspections**

At the time of the inspection, Magellan was conducting weekly inspections of the hazardous waste storage area.

### **CLOSING CONFERENCE:**

I conducted the closing conference with Ms. Nichols. I explained to her that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to Magellan.

I departed Magellan around 1:30pm.

### **ATTACHMENT: (4)**

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Examples of training documents.
Attachment 3	Figure E-3 – EPA/RCRA Cross Reference.
Attachment 4	Inspection Checklist



# ATTACHMENT 1





# Photographs for Magellan Midstream Partners, L.P.

## Media: RCRA

**Disk Number** 1  
**Photo Number** 1  
**Photo Filename** DSCN0488.JPG  
**Date/Time** 11/13/2012  
12:35:00 PM  
**Photographer** Jamie Paulin

### Description

Roll-off being stored with a hazardous waste label and an accumulation date of, 7/13/12. The roll-off was storing corrosive blast grit. The date would have suggested storage over 90 days. Williams Pipeline showed that the material was non-hazardous.



**Disk Number** 1  
**Photo Number** 2  
**Photo Filename** DSCN0489.JPG  
**Date/Time** 11/13/2012  
12:35:00 PM  
**Photographer** Jamie Paulin

### Description

Roll-off being stored with a hazardous waste label and an accumulation date of, 7/13/12. The roll-off was storing corrosive blast grit. The date would have suggested storage over 90 days. Williams Pipeline showed that the material was non-hazardous.





# Photographs for Magellan Midstream Partners, L.P.

## Media: RCRA

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**Disk Number** 1  
**Photo Number** 3  
**Photo Filename** DSCN0490.JPG  
**Date/Time** 11/13/2012  
12:36:00 PM  
**Photographer** Jamie Paulin

### Description

Roll-off being stored with a hazardous waste label and an accumulation date of, 7/13/12. The roll-off was storing corrosive blast grit. The date would have suggested storage over 90 days. Williams Pipeline showed that the material was non-hazardous.



**Disk Number** 1  
**Photo Number** 4  
**Photo Filename** DSCN0491.JPG  
**Date/Time** 11/13/2012  
12:42:00 PM  
**Photographer** Jamie Paulin

### Description

Universal Waste Storage Area.







# Photographs for Magellan Midstream Partners, L.P.

## Media: RCRA

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**Disk Number** 1  
**Photo Number** 5  
**Photo Filename** DSCN0492.JPG  
**Date/Time** 11/13/2012  
12:46:00 PM  
**Photographer** Jamie Paulin

### Description

Hazardous Waste Accumulation Storage Area. 55-gallon containers of sorbent pads and petroleum impacted soil.



**Disk Number** 1  
**Photo Number** 6  
**Photo Filename** DSCN0493.JPG  
**Date/Time** 11/13/2012  
12:47:00 PM  
**Photographer** Jamie Paulin

### Description

Hazardous Waste Storage Area. One unlabeled 55-gallon container was being stored here, along with the hazardous waste storage container.





# Photographs for Magellan Midstream Partners, L.P.

Media: RCRA

---

*Disk Number* 1  
*Photo Number* 7  
*Photo Filename* DSCN0494.JPG  
*Date/Time* 11/13/2012  
12:50:00 PM  
*Photographer* Jamie Paulin

## *Description*

Satellite Accumulation Area Storage Area.  
One 55-gallon container of hazardous  
aerosol solvents was being stored in this area.







## ATTACHMENT 2



**MAGELLAN MIDSTREAM PARTNERS**  
**2012 ANNUAL TRAINING PLAN**

**Annual Training**

CMS Training Task Name	Topics Covered	Delivery Method	Vendor	Note
HAZWOPER – 8 hour refresher (Day 1)	<ul style="list-style-type: none"> <li>• Hazwoper refresher</li> <li>• Release Reporting</li> </ul>	Instructor-led during annual training	Jeff Zipfel, Karen Nelson, and/or Kris Thorne.	The task due date for HAZWOPER is based upon your last completion date and is due every 365 days. We <b>CANNOT adjust the due date as it is required by OSHA on a strict annual basis.</b>
Annual Topics Training 2012 (Day 2)	<ul style="list-style-type: none"> <li>• 3E MSDS</li> <li>• Air Monitoring</li> <li>• Confined Space Awareness</li> <li>• Hazardous Waste Manifest</li> <li>• Hazard Communication &amp; PPE</li> <li>• Hot Work Permitting</li> <li>• Lockout/Tagout</li> <li>• Material of Trade</li> <li>• Opacity Training</li> <li>• Powered Industrial Trucks (Awareness &amp; Classification)</li> <li>• Respiratory Protection (Selection &amp; Use)</li> <li>• Trenching &amp; Excavation Awareness</li> <li>• Toxic &amp; Hazardous Substances               <ul style="list-style-type: none"> <li>▪ Anhydrous Ammonia</li> <li>▪ Asbestos Awareness</li> <li>▪ Benzene Awareness</li> <li>▪ H2S Awareness</li> <li>▪ Lead Awareness</li> </ul> </li> <li>• Mercury</li> <li>• Bloodborne Pathogens</li> </ul>	Instructor-led during annual training	Jeff Zipfel, Karen Nelson, and/or Kris Thorne..	This series of topics will be divided into a few tasks; one for annual topics and one for toxic and hazardous substances in CMS. These topics will be due at the end of the year. In 2012 this task will be due by December 31, 2012. Please complete these tasks when you return from annual training.

2010

Magellan Midstream Partners, L.P.			
TRAINING ATTENDANCE ROSTER		02-FORM-0201	
Magellan Commitment	01/01/05	Revision: 0	Page 1 of 2

## Training Attendance Roster

Please complete all sections

Topic/Class Name (Print): Annual Topics Training Course ID: \_\_\_\_\_

Hours: 8 Date(s): 3/9/2010 Location: Minneapolis

Instructor(s)/Facilitator(s)(print): Jeff Zipfel

Attendee's Name (Print)	Supervisor	Cost Center	Signature
Curt Anderson	Clay Wagner	5208	Curt Anderson
Sarah Lunnberg-Vance	Jason Huso	5129	Sarah Lunnberg-Vance
Don Jensen	Troy Bronson	5008	Don Jensen
Dan Radog	Clay Wagner	5224	Dan Radog
Brett Vahl	Clay Wagner	5116	Brett Vahl
Clay Stephens	John Riley	5207	Clay Stephens
Michael Anderson	John Riley	5207	Michael Anderson
Mike Lyon	Linda Nichols	5210	Mike Lyon
Linda Nichols	Huso	5210	Linda Nichols

I certify that the above participants attended and completed training on the topic listed.

Instructor Signature: Jeff Zipfel

Instructor 2 Signature: \_\_\_\_\_

Invoice: 8007-16

3/20/2010

Magellan Midstream Partners, L.P.			
TRAINING ATTENDANCE ROSTER		02-FORM-0201	
Magellan Commitment	01/01/05	Revision: 0	Page 1 of 2

## Training Attendance Roster

Please complete all sections

Topic/Class Name (Print): Annual Topics Training Course ID: \_\_\_\_\_

Hours: 8 Date(s): 3/9/2010 Location: Minneapolis

Instructor(s)/Facilitator(s)(print): Jeff Zipfel

Attendee's Name (Print)	Supervisor	Cost Center	Signature
Troy Bronson	CLAUSEN	5210	Troy A. Bronson
Tom Heikkila	L. Nichols	5210	Thomas Heikkila
Edward A. Boyd	R. Woodbridge		Edward A. Boyd
Rob Lopez	L. Nichols	5210	Rob Lopez
Steven Prelio	C. Wagner	5209	Steven Prelio
Errol P. Skinner	"	5343	Errol P. Skinner
Calvin Yeager	Bronson	5008	Calvin Yeager
John Reme	Nichols	5210	John Reme
Steve Johansen	Wagner	5368	Steve Johansen
Linda Nichols	Husa	5210	Linda Nichols

I certify that the above participants attended and completed training on the topic listed.

Instructor Signature: Jeff Zipfel

Instructor 2 Signature: \_\_\_\_\_

Invoice #: 2007-116  
3/20/2010

Magellan Midstream Partners, L.P.			
TRAINING ATTENDANCE ROSTER		02-FORM-0201	
Magellan Commitment	01/01/05	Revision: 0	Page 1 of 2

## Training Attendance Roster

Please complete all sections

Topic/Class Name (Print): Annual Topics Training Course ID: \_\_\_\_\_

Hours: 8 Date(s): 1/21/10 Location: Minneapolis

Instructor(s)/Facilitator(s)(print): Jeff Zipfel

Attendee's Name (Print)	Supervisor	Cost Center	Signature
Mike Carey	Wagner	5568	Mike Carey
Brandon Gehrels	Wagner	5568	Brandon Gehrels
JEFF GEARMAN	HAUGEN	217	Jeff Gearman
Dave Burton	BARR	213	Dave Burton
MIKE MEYER	L. Nichols	5210	Mike Meyer
Mark Tigges	L. Nichols	5247	Mark Tigges
Allen Mans	Wagner	5343	Allen Mans
WADE LUECK	BRANSON	5008	Wade Lueck
Edward Dolezal	Wagner	5209	Edward Dolezal
Scott Goshen	NICHOLS	5210	Scott Goshen
Joe Balducci	Nichols	5210	Joe Balducci
DOUG DANIELSON	NICHOLS	5210	Doug Danielson

I certify that the above participants attended and completed training on the topic listed.

Instructor Signature: Jeff Zipfel

Instructor 2 Signature: \_\_\_\_\_

Magellan Midstream Partners, L.P.			
TRAINING ATTENDANCE ROSTER		02-FORM-0201	
Magellan Commitment	01/01/05	Revision: 0	Page 1 of 2

## Training Attendance Roster

Please complete all sections

Topic/Class Name (Print): Annual Topics Training Course ID: \_\_\_\_\_

Hours: 8 Date(s): 1/21/1010 Location: Minneapolis

Instructor(s)/Facilitator(s)(print): Jeff Zipfel

Attendee's Name (Print)	Supervisor	Cost Center	Signature
D. Nicholson	Branson	5008	<i>[Signature]</i>
Brian Smith	Wagner	5568	<i>[Signature]</i>
Brad Bauer	Wagner	5500	<i>[Signature]</i>
Amber Kistler	Stackhouse		<i>[Signature]</i>
HOWARD WHITE	BRANSON	5008	<i>[Signature]</i>
Richard D. Partridge	Branson	5008	<i>[Signature]</i>
Pickie P. Maley	Wagner	5-670	<i>[Signature]</i>
Mike Kennedy	Brad Sandy	5006	<i>[Signature]</i>

I certify that the above participants attended and completed training on the topic listed.

Instructor Signature: *[Signature]*

Instructor 2 Signature: \_\_\_\_\_

Magellan Midstream Partners, L.P.			
TRAINING ATTENDANCE ROSTER		02-FORM-0201	
Magellan Commitment	01/01/05	Revision: 0	Page 1 of 2

## Training Attendance Roster

Please complete all sections

Topic/Class Name (Print): Annual Topics Training Course ID: \_\_\_\_\_

Hours: 8 Date(s): 2/25/2010 Location: Minneapolis

Instructor(s)/Facilitator(s)(print): Jeff Zipfel

Attendee's Name (Print)	Supervisor	Cost Center	Signature
Jon Ahlert	Linda N	5247	Jon Ahlert
Darrin Foster	Tom Barr	214	Darrin Foster
Jeff Anderson	Linda Nichols	5210	Jeff Anderson
Amber Kistler	M Strickhase		Amber Kistler
Glenn Binkemeyer	Clay Wagner	5208	Glenn Binkemeyer
Clay WAGNER	JASON HUDO	5568	Clay Wagner
Terrick Giefer	Clay Wagner	5224	Terrick Giefer
Jake Johnson	John Riley	5207	Jake Johnson
Dean Miller	Clay Wagner	5680	Dean Miller
Jason Huso	Mike Pansa	5129	Jason Huso
SCOTT BENIK	TEERRI STEWELL	3169	Scott Benik
Mike Lademann	L Nichols	5210	Mike Lademann
Thomas Mamer	Clay Wagner	5568	Thomas Mamer
		5	

I certify that the above participants attended and completed training on the topic listed.

Instructor Signature: Jeff Zipfel

Instructor 2 Signature: \_\_\_\_\_



Magellan Midstream Partners, L.P.			
TRAINING ATTENDANCE ROSTER		02-FORM-0201	
Magellan Commitment	01/01/05	Revision: 0	Page 1 of 2

## Training Attendance Roster

Please complete all sections

Topic/Class Name (Print): Annual Topics Training Course ID: \_\_\_\_\_

Hours: 8 Date(s): 2/25/2010 Location: Minneapolis

Instructor(s)/Facilitator(s)(print): Jeff Zipfel

Attendee's Name (Print)	Supervisor	Cost Center	Signature
Clair Madsen	TROY BRONSON	5008	Clair Madsen
TONY HARGREAVES	Nichols	5210	Long Hargreaves
STEVEN STORBY	CLAY MAGNER	5568	Storby
PAUL L POELAERT	BRONSON	5008	Paul Poelaert
Heath Bragler	Bronson	5008	Heath Bragler
MARK POKUM	MARK HAUGEN	5217	Mark Pokum
George Spert	Bronson	5008	George Spert
MARY K. TOUSIGNANT	Nichols	5210	Mary K. Tousignant

I certify that the above participants attended and completed training on the topic listed.

Instructor Signature: Jeff Zipfel

Instructor 2 Signature: \_\_\_\_\_



# ATTACHMENT 3



FIGURE E-3 - EPA / RCRA CROSS-REFERENCE

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
<b>§ 265.50</b>	<b>Applicability</b>	
	The regulations in this subpart apply to owners and operators of all hazardous waste facilities, except as 265.1 provides otherwise.	Section 1.1
<b>§ 265.51</b>	<b>Purpose and Implementation of Contingency Plan</b>	
a	Each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.	Section 1.1
b	The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.	Section 1.1
<b>§ 265.52</b>	<b>Content of Contingency Plan</b>	
a	The contingency plan must describe the actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.	Section 2
b	If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasure (SPCC) Plan in accordance with Part 112 of this chapter, or Part 1510 of Chapter V, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this part.	Section 7.3
c	The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 265.37.	Figure 3.1-3
d	The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.	Figure 1-3
e	The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.	Figure 4-2

FIGURE E-3 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
<b>§ 265.52</b>	<b>Content of Contingency Plan, Continued</b>	
f	The plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).	Section 2.3, Section 5-Figure 2
<b>§ 265.53</b>	<b>Copies of Contingency Plan</b>	
	A copy of the contingency plan and all revisions to the plan must be:	---
a	Maintained at the facility, and	Section 1.2; Figure 2.2
b	Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.	Section 1.2; Figure 2.2
<b>§ 265.54</b>	<b>Amendment of Contingency Plan</b>	
	The contingency plan must be reviewed, and immediately amended, if necessary, whenever:	---
a	Applicable regulations are revised;	Section 1.2
b	The plan fails in an emergency;	Section 1.2
c	The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;	Section 1.2
d	The list of emergency coordinators changes; or	Section 1.2
e	The list of emergency equipment changes.	Section 1.2
<b>§ 265.55</b>	<b>Emergency Coordinator</b>	
	At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.  [Comment: The emergency coordinator's responsibilities are more fully spelled out in 265.56. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of waste(s) handled by the facility, and type and complexity of the facility].	Figure 1-3; Section 4.5; Appendix A

FIGURE E-3 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
§ 265.56	Emergency Procedures	
a	Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:	Section 4.5
a(1)	Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and	Section 4.5
a(2)	Notify appropriate State or local agencies with designated response roles if their help is needed.	Section 4.5
b	Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.	Section 4.5
c	Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).	Section 4.5
d	If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside of the facility, he must report his findings as follows:	Section 4.5
d(1)	If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and	Section 4.5
d(2)	He must immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510 of this Title), or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:	Section 4.5; Figure 3.1-2
d(2)(i)	Name and telephone number of reporter:	Figure 3.1-2
d(2)(ii)	Name and address of facility;	Figure 3.1-2
d(2)(iii)	Time and type of incident (e.g., release, fire);	Figure 3.1-2
d(2)(iv)	Name and quantity of material(s) involved, to the extent known;	Figure 3.1-2
d(2)(v)	The extent of injuries, if any; and	Figure 3.1-2
d(2)(vi)	The possible hazards to human health, or the environment, outside the facility.	Figure 3.1-2

"center"&gt;FIGURE E-3 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
§ 265.56	Emergency Procedures (Cont'd)	
e	During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.	Section 2; Figure 2.1-1
f	If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, wherever this is appropriate.	Section 2; Figure 2.1-1
g	Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.  <i>[Comment: Unless the owner or operator can demonstrate, in accordance with § 261.3(c) or (d) of this chapter, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this chapter].</i>	Section 7.3; Section 5.5
h	The emergency coordinator must ensure that, in the affected areas(s) of the facility:	—
h(1)	No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and	Section 7.3; Section 5.5
h(2)	All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.	Section 5.4
i	The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this section before operations are resumed in the affected area(s) of the facility.	Figure 3.1-3
j	The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:	Section 8.3
j(1)	Name, address, and telephone number of the owner or operator;	Section 8.3
j(2)	Name, address, and telephone number of the facility;	Section 8.3
j(3)	Date, time, and type of incident (e.g., fire, explosion);	Section 8.3



FIGURE E-3 - EPA / RCRA CROSS-REFERENCE, CONTINUED

EPA / RCRA REQUIREMENTS (40 CFR PART 265.50 - 265.56)		LOCATION
§ 265.56	Emergency Procedures (Cont'd)	
j(4)	Name and quantity of material(s) involved;	Section 8.3
j(5)	The extent of injuries, if any;	Section 8.3
j(6)	An assessment of actual or potential hazards to human health or the environment, where this is applicable; and	Section 8.3
j(7)	Estimated quantity and disposition of recovered material that resulted from the incident.	Section 8.3

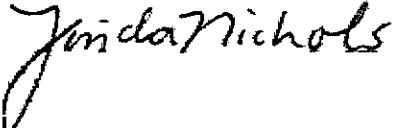
FIGURE E-4 - OSHA CROSS-REFERENCE

<b>OSHA EMPLOYEE EMERGENCY PLANS AND FIRE PREVENTION PLANS</b> <b>(29 CFR 1910.38 AND 1910.39)</b>	<b>LOCATION</b>
<b>Emergency Action Plans (29 CFR 1910.38)</b>	
(c) Minimum elements of an emergency action plan. An emergency action plan must include at a minimum:	
(c)(1) Procedures for reporting a fire or other emergency;	Figure 2-1
(c)(2) Procedures for emergency evacuation, including type of evacuation and exit route assignments;	Figure C-7
(c)(3) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;	Section 2.3
(c)(4) Procedures to account for all employees after evacuation;	Section 2.3
(c)(5) Procedures to be followed by employees performing rescue or medical duties; and	Section 2.4
(c)(6) The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.	Figure 3.1-3, Section 4.6
(d) Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in §1910.165.	Section 2.3
(e) Training. An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.	Figure A.2-1
(f) Review of emergency action plan. An employer must review the emergency action plan with each employee covered by the plan:	
(f)(1) When the plan is developed or the employee is assigned initially to a job;	Figure A.2-1
(f)(2) When the employee's responsibilities under the plan change; and	Figure A.2-1
(f)(3) When the plan is changed.	Figure A.2-1
<b>HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE</b> <b>(29 CFR 1910.120)</b>	<b>LOCATION</b>
(l)(2) Elements of an emergency response plan. The employer shall develop an emergency response plan for emergencies which shall address, as a minimum, the following:	
(l)(2)(i) Pre-emergency planning.	Appendix C, Appendix D
(l)(2)(ii) Personnel roles, lines of authority, training, and communication.	Section 4
(l)(2)(iii) Emergency recognition and prevention.	Section 2.1
(l)(2)(iv) Safe distances and places of refuge.	Figure C-7
(l)(2)(v) Site security and control.	Figure 2.1-1, Section 5.6, Section 7.2
(l)(2)(vi) Evacuation routes and procedures.	Section 2.3, Figure C-7
(l)(2)(vii) Decontamination procedures which are not covered by the site safety and health plan.	Section 5.4
(l)(2)(viii) Emergency medical treatment and first aid.	Section 5.4

FIGURE E-4 - OSHA CROSS-REFERENCE, CONTINUED

HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (29 CFR 1910.120)	LOCATION
(I)(2)(ix) Emergency alerting and response procedures.	Section 2.3
(I)(2)(x) Critique of response and follow-up.	Section 8.3
(I)(2)(xi) PPE and emergency equipment.	Section 5.4, Section 7.1.1
(I)(3) Procedures for handling emergency incidents.	
(I)(3)(i) In addition to the elements for the emergency response plan required in paragraph (I)(2) of this section, the following elements shall be included for emergency response plans:	
(I)(3)(i)(A) Site topography, layout, and prevailing weather conditions.	Figure 1-2, Figure D.4-1
(I)(3)(i)(B) Procedures for reporting incidents to local, state, and federal governmental agencies.	Figure 3.1-1
(I)(3)(ii) The emergency response plan shall be a separate section of the Site Safety and Health Plan.	Section 5.3
(I)(3)(iii) The emergency response plan shall be compatible and integrated with the disaster, fire and/or emergency response plans of local, state, and federal agencies.	Section 1.1
(I)(3)(iv) The emergency response plan shall be rehearsed regularly as part of the overall training program for site operations.	Figure A.2-1
(I)(3)(v) The site emergency response plan shall be reviewed periodically and, as necessary, be amended to keep it current with new or changing site conditions or information.	Section 1.2
(I)(3)(vi) An employee alarm system shall be installed in accordance with 29 CFR 1910.165 to notify employees of an emergency situation, to stop work activities if necessary, to lower background noise in order to speed communication, and to begin emergency procedures.	Section 2.3
(I)(3)(vii) Based upon the information available at time of the emergency, the employer shall evaluate the incident and the site response capabilities and proceed with the appropriate steps to implement the site emergency response plan.	Figure 2-1, Section 2.1

FIGURE E-5 - EPA RESPONSE PLAN COVER SHEET

Owner/ operator of facility:	Magellan Pipeline Company, L.P.
Facility name:	Minneapolis Terminal
Facility address (street address or route):	2451 West County Road C
City, state, and U.S. zip code	Roseville, MN 55113
Facility mailing address:	As above
Facility phone number.:	(651) 633-4171
Latitude:	45 ° 01 ' 27 " N
Longitude:	-93 ° 12 ' 02 " W
Dun & Bradstreet number:	00-718-1193
Largest above ground oil storage tank capacity (gallons):	3,360,000
Number of above ground oil storage tanks:	74 (including additive tanks)
North American Industrial Classification System (NAICS):	486910
Maximum oil storage capacity (gallons):	83,789,192
Worst case oil discharge amount (bbls.):	78,674
Facility distance to navigable water; mark the appropriate line.	
0-1/4 <input type="checkbox"/> 1/4-1/2 mile <input type="checkbox"/> 1/2 - 1 mile <input checked="" type="checkbox"/> > 1 mile <input type="checkbox"/>	
<b>APPLICABILITY OF SUBSTANTIAL HARM CRITERIA</b>	
Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?	
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Does the facility have a total oil storage capacity greater than or equal to one million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?	
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula in or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?	
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (using the appropriate formula in or a comparable formula) such that a discharge from the facility would shut down a drinking water intake?	
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Does the facility have a total oil storage capacity greater than or equal to one million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?	
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
<b>CERTIFICATION</b>	
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.	
Signature: 	Date: 01/18/05
Name: Linda Nichols	Title: Area Supervisor

## FIGURE E-6 - STATE CROSS-REFERENCE

## HAZARDOUS WASTE MANAGEMENT CODE CROSS-REFERENCE

MINNESOTA POLLUTION CONTROL AGENCY (Minnesota Rules, Chapter 7045)		LOCATION
<b>Chapter 7045.0275</b>	<b>Additional Requirements for Generators</b>	
Subpart 2	Any person in control of a hazardous waste that spills, leaks, or otherwise escapes from a container, tank or other containment system, including its associated piping, shall immediately notify the agency if the hazardous waste may cause pollution of the air, land resources, or waters of the state. The person shall use the appropriate Minnesota duty officer's 24-hour telephone number:	Section 4.5; Figure 3.1-2
A	(651) 649-5451 for Twin Cities' local calling area and outside Minnesota;	Section 4.5; Figure 3.1-2
B	(800) 422-0798 for greater Minnesota;	Section 4.5; Figure 3.1-2
C	(651) 297-5353 for TDD for Twin Cities' local calling area and outside Minnesota; or	Section 4.5; Figure 3.1-2
D	(800) 627-3529 for TDD for greater Minnesota.	Section 4.5; Figure 3.1-2
Subpart 3	Any person who generates a hazardous waste that spills shall recover the hazardous waste as rapidly and as thoroughly as possible and shall immediately take other action as may be reasonably possible to protect human life and health and minimize or abate pollution of the water, air, or land resources of the state.	Section 4.5;
<b>Chapter 7045.0464</b>	<b>Additional Requirements for Generators</b>	
Subpart 1	The owner or operator shall attempt to make the following arrangements:	---
A	arrangements to familiarize the police, fire departments, and emergency response teams with the location of storage and accumulation areas within the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes;	Section 1.2; Figure 2.2
B	if more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;	Section 1.2; Figure 2.2
C	agreements with state emergency response teams, emergency response contractors, and equipment suppliers; and	Section 1.2; Figure 2.2

## HAZARDOUS WASTE MANAGEMENT CODE CROSS-REFERENCE

MINNESOTA POLLUTION CONTROL AGENCY (Minnesota Rules, Chapter 7045)		LOCATION
Chapter 7045.0275	Additional Requirements for Generators	
D	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.	Section 1.2; Figure 2.2
Subpart 2	If state of local authorities decline to enter into arrangements required under subpart 1, the owner or operator shall document the refusal in the operating record.	Section 1.2; Figure 2.2
Subpart 3	The owner or operator shall document attempts under subpart 1 to make arrangements with local authorities in the operating record.	Section 1.2; Figure 2.2
Subpart 5	A copy of the contingency plan and all revisions to the plan must be:	—
A.	maintained at the facility:	Section 1.2; Figure 2.2
B.	submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services; and	Section 1.2; Figure 2.2
C.	submitted to the commissioner with the permit application and, after modification or approval, will become a condition of any permit issued,	Section 1.2; Figure 2.2

## MINNESOTA CROSS-REFERENCE

MINNESOTA PREVENTION AND RESPONSE PLAN (115E.04)	LOCATION
Describe how it is consistent with the requirements of the NCP and ACP (1)**	Section 1.1
Describe the measures taken to prevent discharges from occurring (2)	Appendix C
Identify the individual(s) having authority to implement response actions and their qualifications and titles (3)	Figure 1-3
Identify how communication and incident command relationships will be established between the individuals in command of a facility response and the following persons:	
<ul style="list-style-type: none"> <li>Individuals in the employ of the facility's owner or operator who are responding to the discharge (4i)</li> </ul>	Sections 4.4, Sections 7.1.6
<ul style="list-style-type: none"> <li>Appropriate federal, state, and local officials (4ii)</li> </ul>	Sections 4.4, Sections 7.1.6
<ul style="list-style-type: none"> <li>Other persons providing emergency response equipment and personnel (4iii)</li> </ul>	Sections 4.4, Sections 7.1.6, Appendix B
Describe the facility and identify the locations and characteristics of potential worst case discharges from the facility (5)	Figure 1-3; Appendix C, Appendix D
Identify the means that will be used to satisfy the requirement to have adequate equipment and personnel to respond to a worst case discharge (6)	Appendix B, Appendix D
Copies of contracts, showing that adequate personnel and equipment will be available to respond to a worst case discharge (7)	Appendix B
Describe the actions that will be taken in the event of a worst case discharge (8)	Response Procedures Flow Chart, Section 2, Appendix D
Describe the training, equipment testing, periodic drills, and unannounced drills that will be used to ensure that the persons and equipment are ready for response (9)	Section 7.1.2, Appendix A

\*\* Minnesota regulation reference





# ATTACHMENT 4



## Minnesota Pollution Control Agency

Report Title: Large Quantity Generator (LQG) Compliance Evaluation Inspection Checklist

Preferred ID:

Regulated Party:

Date:

Inspector:

### G1: Licensing / EPA / Permits

Rule	Requirement	Compliance Status	Remarks
7045.0221	Has Regulated Party obtained a generator identification number?	✓	
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	✓	
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	N/A	
7045.0230 1, B	Outstate - Did the Regulated Party include all hazardous waste streams on its license application?	N/A	
7045.0225 2	Is the Regulated Party's license displayed in a public area at the licensed site?	✓	
7001.0520 1, A	Does the Regulated Party operate as a TSD without a permit?		?
MS 116.48 1	Are aboveground tanks >500 G registered with the MPCA? Are underground tanks registered with the MPCA?	N/A	

### G1: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated? _____	?	
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	?	



## G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1	Is hazardous waste properly disposed of?	✓	
7045.0208 1, E	Does the Regulated Party comply with the POTW requirements for sewerage hazardous waste?		2.
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?		2.
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	✓	
7045.0568 3	Has the Regulated Party documented in its operating record the arrangements made with local emergency authorities?	✓	
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	N/A	
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the Regulated Party follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?	N/A	
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	N/A	
7045.0845	Does the Regulated Party properly manage used oil?	No	
7045.0895 4	Has used oil accepted from or given to another business to be burned for energy recovery been tested to determine that it is on-specification?		



### G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil leaving the generator site for at least three years?	1	
7045.0805	Does the Regulated Party properly manage used oil-contaminated waste?	N/A	
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil-contaminated waste leaving the generator site for at least three years?	✓	
7045.0990	Is the Regulated Party properly managing used oil filters?	?	
7045.0990 3, C, 3	Does the Regulated Party keep records of all used oil filters taken off-site by used oil-filter transporters for at least three years?	?	

### G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	✓	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to Regulated Party personnel?	?	
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?	✓	
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	✓	





### G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment) ?	?	
7045.0566 4	Is emergency equipment tested and maintained?	✓	
7045.0566 5	Does the Regulated Party provide all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled with immediate access to an internal alarm or emergency communication device?	✓	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc)?	✓	
7060.0600 2	Has the Regulated Party discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	?	
7045.0275 2	If the Regulated Party had a release to the environment did the Regulated Party immediately notify the agency?	?	
7045.0275 3	If the Regulated Party has had a release, did the Regulated Party recover as rapidly and as thoroughly as possible, any HW that has leaked, spilled, or otherwise escaped a container?	?	
7045.0855 2, D	Upon detection of a release of used oil to the environment (not originating from a UST) did the Regulated Party stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials contaminated with used oil, and repair or replace any leaking used oil storage equipment prior to returning it to service to prevent future releases?	?	



## G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 1, F	Are hazardous waste containers & tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	No	mis labeled & not labeled
7045.0292 1, C	Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR Is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?	No 1x 55 gal drum	
7045.0292 1, A	Has the generator stored HW for more than 90 days beyond the waste accumulation start date?	?	
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles & equipment?	yes	
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	✓	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	✓	
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?	✓	
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?	✓	
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?	✓	
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?	✓	



### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0626 6	Are incompatible wastes adequately separated?	✓	
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	✓	
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	?	N/A
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	✓	
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	?	
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	N/A	
7045.0855 2, C	Are wastes contaminated with used oil stored in containers or tanks that are in good condition, on impermeable surfaces, closed, and labeled "Used Oil" or "Used Oily Waste"?	N/A	
7045.0990 3, A	If used oil filters are stored, are they stored in containers that are closed, leakproof and labeled "Used Oil Filters"?	N/A	
273.14 (a)	Are universal waste batteries (each battery), or a battery storage container, labeled with: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"?	✓	
273.13 (a)	Are universal waste batteries (lead acid, NiCad, etc) that show evidence of leakage, spillage, or damage stored in a closed, structurally sound, compatible container?	✓	



### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
273.14 (e)	Are containers of universal waste lamps labeled with: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"?	✓	
273.13 (d)	Are universal waste lamps stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible? Do containers lack evidence of leakage, spillage, or damage?	✓	
273.13 (c)	Is mercury containing equipment stored in closed containers that are structurally sound, compatible with the contents of the device? Does the container lack evidence of leakage, spillage, or damage?	✓	
273.14 (d)	Is mercury containing equipment (i.e. each device) or a container in which the equipment is contained labeled with: "Universal Waste - Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury -Containing Equipment"?	✓	

### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.02611	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)	No	
7045.02617	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, <u>required signatures &amp; dates</u> , and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)		2.
7045.02651, D	Have copies of manifests signed by the generator and transporter been sent to the MPCA within five working days of the initial transporter's acceptance of the waste?	✓	
7045.02654, A	Have copies of manifests signed by the facility been sent to the MPCA within 40 days of the acceptance of the waste by the facility?	✓	





### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?		2
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	No	
7045.0302 1	If Regulated Party exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc)	N/A	

### G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	Yes	

### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training program?	✓	
7045.0558 2	Does the Regulated Party have a hazardous waste program director trained in hazardous waste management procedures?	✓	
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	✓	



### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	✓	
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	✓	
7045.0558 6, A	Does the Regulated Party maintain training records which include a job title for each position at the facility related to hazardous waste?	✓	
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	✓	
7045.0558 6, C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	✓	
7045.0558 6, D	Has the Regulated Party kept records that document that the initial training and annual review training has been given?	✓	
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves.)?	✓	

### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the Regulated Party have a contingency plan?	✓	
7045.0574 1	Does the Regulated Party have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources?)	✓	



### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?	✓	
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders?	✓	
7045.0572 4, D	Does the plan include up-to-date name, address and Home and Work phone numbers for emergency coordinators?	✓	
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?	✓	
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?	✓	
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?	✓	
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?	✓ 2.	
7045.0572 6	Has the contingency plan been amended when necessary? (rule change, emerg.eqpt change, process change, emerg. coord. change, plan failed)	2.	

